

ee. "Communication" means any discussion or any written or electronic correspondence or recorded voice message of any kind.

ff. "Employee" means any director, trustee, officer, employee, partner, corporate parent, subsidiary, affiliate or servant of the designated entity, whether active or retired, full-time or part-time, current or former, and compensated or not.

gg. "Representative" means any consultant, expert, attorney, contractor or other individual or entity engaged by the designated entity to perform some task or assignment for the entity.

hh. "Entity" means any corporation, company, partnership, proprietorship, joint venture, or business, as well as any governmental unit.

ii. "Person" means any natural person or legal entity, including but not limited to any corporation, partnership, proprietorship, firm, trust, association, government entity, organization, or group of persons.

Instructions

a. The singular of a term includes the plural number and vice versa, any use of gender includes both genders, and a verb tense includes all other verb tenses where the clear meaning is not distorted by addition of another tense or tenses.

b. Unless otherwise specified, supply all information requested for the period January 1, 1999 through the present.

REQUESTS FOR ADMISSION

1. Station KZPO was licensed to Lindsay Broadcasting.
2. Linda Ware was the sole officer and director of Lindsay Broadcasting.
3. Linda Ware was not involved in the operation of Station KZPO.
4. Linda Ware did not control Station KZPO.

5. Mr. Zawila controls Station KZPO.
6. Since the Commission granted Lindsay Broadcasting a license for Station KZPO, Mr. Zawila has controlled the operations of Station KZPO.
7. The Commission granted an application for the transfer of control of the license for Station KZPO from Linda Ware d/b/a Lindsay Broadcasting to The Estate of Linda Ware, Cynthia Rampage, Executor.
8. Cynthia Rampage is the executor of The Estate of Linda Ware.
9. Mr. Zawila is not the executor of The Estate of Linda Ware.
10. Cynthia Rampage is not involved in the operation of Station KZPO.
11. Mr. Zawila assumed control of Station KZPO from Linda Ware.
12. Mr. Zawila assumed control of Station KZPO from Lindsay Broadcasting.
13. Mr. Zawila assumed control of Station KZPO from The Estate of Linda Ware.
14. Mr. Zawila assumed control of Station KZPO from Cynthia Rampage.
15. Mr. Zawila assumed control of Station KZPO without seeking Commission authorization
16. Mr. Zawila did not request Commission authorization to assume control of Station KZPO.
17. Mr. Zawila did not receive Commission authorization to control Station KZPO.
18. As of September 1998, Station KZPO did not have a main studio.
19. As of February 2001, Station KZPO did not have a main studio.
20. Station KZPO does not have a main studio.
21. Station KZPO has never had a main studio.
22. Station KZPO does not have a staffed main studio.

23. Station KZPO has never had a staffed main studio.
24. As of March 2001, there was no EAS equipment at the Station KZPO site.
25. Station KZPO did not maintain operational EAS equipment on site.
26. Station KZPO does not maintain operational EAS equipment on site.
27. As of March 2001, Station KZPO operated at a transmitter output power greater than 105% of the output power authorized by the Commission.
28. Station KZPO has always operated at a transmitter output power greater than 105% of the output power authorized by the Commission.
29. Station KZPO currently operates at a transmitter output power greater than 105% of the output power authorized Commission.
30. As of May 2001, Station KZPO did not maintain EAS logs.
31. As of May 4, 2001, Station KZPO did not have accurate EAS logs.
32. Station KZPO never maintained EAS logs.
33. Station KZPO does not have EAS logs.
34. As of May 2001, Lindsay Broadcasting did not maintain EAS logs for Station KZPO.
35. Lindsay Broadcasting does not have EAS logs for Station KZPO.
36. As of May 2001, Linda Ware did not maintain EAS logs for Station KZPO.
37. Linda Ware never maintained EAS logs for Station KZPO.
38. The Estate of Linda Ware never maintained EAS logs for Station KZPO.
39. The Estate of Linda Ware does not have EAS logs for Station KZPO.
40. As of May 2001, Mr. Zawila did not maintain EAS logs for Station KZPO.
41. Mr. Zawila never maintained EAS logs for Station KZPO.

42. Mr. Zawila does not have EAS logs for Station KZPO.
43. As of May 2001, Station KZPO did not maintain station logs.
44. Station KZPO never maintained station logs.
45. Station KZPO does not have station logs.
46. As of May 2001, Lindsay Broadcasting did not maintain station logs for Station KZPO.
47. Lindsay Broadcasting never maintained station logs for Station KZPO.
48. Lindsay Broadcasting does not have station logs for Station KZPO.
49. As of May 2001, Linda Ware did not maintain station logs for Station KZPO.
50. Linda Ware never maintained station logs for Station KZPO.
51. The Estate of Linda Ware does not have station logs for Station KZPO.
52. The Estate of Linda Ware never maintained station logs for Station KZPO.
53. As of May 2001, Mr. Zawila did not maintain station logs for Station KZPO.
54. Mr. Zawila never maintained station logs for Station KZPO.
55. Mr. Zawila does not have station logs for Station KZPO.
56. Mr. Zawila is not authorized by The Estate of Linda Ware to act on behalf on The Estate of Linda Ware in connection by Station KZPO.
57. Mr. Zawila prepared Linda Ware's December 18, 1998 declaration attached to Mr. Zawila's December 31, 2002 letter to the Audio Division.
58. Station KZPO is not currently operating.
59. On April 5, 2001, Jay Stevens advised a Commission agent he was not Station KZPO's chief operator.
60. Jay Stevens worked for Station KZPO on a contract basis only.

61. Jay Stevens does not presently work for Station KZPO.
62. Station KZPO has never had a chief operator.
63. Station KZPO does not have a chief operator.
64. Station KZPO did not maintain any agreements with the chief operator in its Public Inspection files.
65. Station KZPO does not have any agreements with the chief operator in its Public Inspection files.
66. Station KZPO's chief operator did not sign its station records and station logs.
67. Station KZPO did not provide copies of documents reflecting Jay Stevens was its chief operator upon request to the Commission's field agents during a March 21, 2001 inspection.
68. Station KZPO did not provide the written designation of its chief operator to the Commission's field agents during a March 21, 2001 inspection.
69. The only written designation of Jay Stevens as the chief operator of Station KZPO was dated March 24, 2001.
70. Jay Stevens did not sign Station KZPO's station records.
71. Jay Stevens does not sign Station KZPO's station records.
72. Jay Stevens did not sign Station KZPO's station logs.
73. Jay Stevens does not sign Station KZPO's station logs.
74. As of May 4, 2001, Station KZPO did not have an EAS handbook.
75. As of May 4, 2001, Station KZPO did not have operational EAS receiving equipment.
76. As of May 4, 2001, Station KZPO had not posted its station license.

77. As of May 4, 2001, Station KZPO's EAS logs were not signed by its chief operator.
78. As of May 4, 2001, Station KZPO's EAS logs were not signed by Jay Stevens.
79. As of May 4, 2001, Station KZPO failed to maintain inspection contracts for the chief operator.
80. As of May 4, 2001, Station KZPO had not posted the written designation of its chief operator.
81. As of May 4, 2001, Station KZPO had not maintained any Public Inspection Files.
82. Ken Niles was never employed by Lindsay Broadcasting.
83. Ken Niles is not employed by Lindsay Broadcasting.
84. Ken Niles is not employed by The Estate of Linda Ware.
85. Ken Niles was never employed by Station KZPO.
86. Ken Niles is not employed by Station KZPO.
87. Ken Niles never staffed the main studio at Station KZPO.
88. Ken Niles does not staff the main studio at Station KZPO.
89. As of April 5, 2001, Station KZPO was operated by computer and controlled remotely by telephone.
90. Station KZPO has always been operated by computer and controlled remotely by telephone.
91. Station KZPO is operated by computer and controlled remotely by telephone.

CERTIFICATE OF SERVICE

I, William Zawila, hereby certify that a copy of the foregoing Response to Enforcement Bureau's Requests for Admission to the Estate of Linda Ware was served on the following by U.S. First Class Mail, postage prepaid, on 3-26-16:

Chief Administrative Law Judge
Richard L. Sippel
FCC

445 12th Street, S.W. - Room 1-C768
Washington, D.C. 20554

Pamela S. Kane, Esquire
Investigations and Hearings Division
Enforcement Bureau
FCC

445 12th Street, S.W. - Room 4-C366
Washington, D.C. 20554

Michael Couzens
6536 Telegraph Avenue -Suite B201
Oakland, CA 94609



William Zawila

Before the
Federal Communications Commission
Washington, DC 20554

Received & Inspected

SEP 08 2017

FCC Mailroom

In the Matter of)

EB Docket No. 03-152

WILLIAM L. ZAWILA)

Facility ID No. 72672

Permittee of FM Station KNGS
Coalinga, California)

AVENAL EDUCATIONAL SERVICES, INC.)

Facility ID No. 3365

Permittee of FM Station KAAX,
Avenal, California)

CENTRAL VALLEY EDUCATIONAL
SERVICES, INC.)

Facility ID No. 9993

Permittee of FM Station KYAF,
Firebaugh, California)

H. L. CHARLES d/b/a FORD CITY
BROADCASTING)

Facility ID No. 22030

Permittee of FM Station KZPE,
Ford City, California)

LINDA WARE d/b/a LINDSAY
BROADCASTING)

Facility ID No. 37725

Licensee of FM Station KZPO,
Lindsay, California)

To: Chief Administrative Law Judge
Richard L. Sippel
To: Enforcement Bureau

RESPONSE TO ENFORCEMENT BUREAU'S REQUESTS FOR
ADMISSION TO THE ESTATE OF H.L. CHARLES

The Estate of H.L. Charles, Robert Willing, Executor, hereby
submits the following response to the Enforcement Bureau's Requests

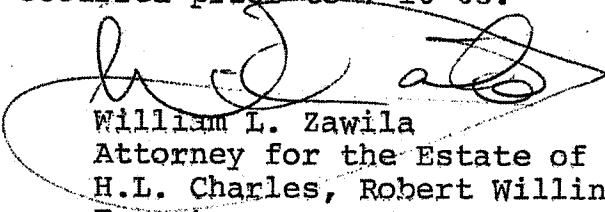
EXHIBIT 2

for Admission pursuant to the recent discovery orders issued by the presiding officer.

Attached hereto is a copy of the said Requests for Admission.

1. The following Requests are admitted: 2,3,8,9,10,26.
2. The following Requests are denied: 4,5,6,7,11, 12,13,14, 15,16,21,23,25,27,28,29,30,31,33,35,36,38,40,42,43.
3. The following Requests are denied based on lack of information or belief: 1,20.
4. The following Requests are objected to on the following grounds: 17,18, and 19 mis-state facts in that they assume that Mr. Zawila controlled Station KZPE when in fact this never occurred. Mr. Zawila did not request FCC authorization or receive FCC authorization to control Station KZPE because he has never controlled Station KZPE.

22,24,32,34,37,39,41, and 44 seek information for irrelevant time periods after the Hearing Designation Order was issued in this matter on 7-16-03. The said HDO upon which this proceeding is based covers matters prior to 7-16-03, not matters after 7-16-03. These Requests numbered above seek information about the current day status of KZPE as well as the current day status and activities of the parties which are all completely irrelevant to the said HDO and matters which occurred prior to 7-16-03.



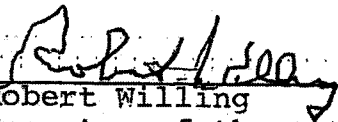
William L. Zawila
Attorney for the Estate of
H.L. Charles, Robert Willing,
Executor
12600 Brookhurst Street - #105
Garden Grove, CA 92840
(714) 636-5040-Telephone
(714) 636-5042-FAX

3-26-16

DECLARATION

I, Robert Willing, declare under penalty of perjury that the statements contained in the foregoing Response to the Enforcement Bureau's Requests for Admission to the Estate of H.L. Charles are true and correct to the best of my knowledge and belief.

Executed on March 26, 2016.


Robert Willing
Executor of the Estate of
H.L. Charles

whether or not in person, by telephone (including voicemails and similar recordings), or otherwise, and electronic communications (including emails) between two or more individuals.

ee. "Communication" means any discussion or any written or electronic correspondence or recorded voice message of any kind.

ff. "Employee" means any director, trustee, officer, employee, partner, corporate parent, subsidiary, affiliate or servant of the designated entity, whether active or retired, full-time or part-time, current or former, and compensated or not.

gg. "Representative" means any consultant, expert, attorney, contractor or other individual or entity engaged by the designated entity to perform some task or assignment for the entity.

hh. "Entity" means any corporation, company, partnership, proprietorship, joint venture, or business, as well as any governmental unit.

ii. "Person" means any natural person or legal entity, including but not limited to any corporation, partnership, proprietorship, firm, trust, association, government entity, organization, or group of persons.

Instructions

a. The singular of a term includes the plural number and vice versa, any use of gender includes both genders, and a verb tense includes all other verb tenses where the clear meaning is not distorted by addition of another tense or tenses.

b. Unless otherwise specified, supply all information requested for the period January 1, 1990 through the present.

REQUESTS FOR ADMISSION

1. FCB did not file an FCC Form 854 filed with WTB certifying the completion of construction of or otherwise concerning the tower (antenna structure) in connection with the

permit for KZPE.

2. The Commission granted a construction permit for Station KZPE to H.L. Charles d/b/a Ford City Broadcasting.

3. H.L. Charles was the sole officer and director of Ford City Broadcasting.

4. H.L. Charles was not involved in the operation of Station KZPE.

5. H.L. Charles did not control Station KZPE.

6. Mr. Zawila controls Station KZPE.

7. Since the Commission granted Ford City Broadcasting a construction permit for Station KZPE, Mr. Zawila has controlled Station KZPE.

8. The Commission granted an application for the transfer of control of the construction permit for Station KZPE from H.L. Charles d/b/a Ford City Broadcasting to The Estate of H.L. Charles, Robert Willing, Executor.

9. Robert Willing is the executor of The Estate of H.L. Charles.

10. Mr. Zawila is not the executor of The Estate of H.L. Charles.

11. Robert Willing is not involved in the operation of Station KZPE.

12. Mr. Zawila assumed control of Station KZPE from H.L. Charles.

13. Mr. Zawila assumed control of Station KZPE from Ford City Broadcasting.

14. Mr. Zawila assumed control of Station KZPE from The Estate of H.L. Charles.

15. Mr. Zawila assumed control of Station KZPE from Robert Willing.

16. Mr. Zawila is not authorized by The Estate of H.L. Charles to act on behalf on The Estate of H.L. Charles in connection by Station KZPE.

17. Mr. Zawila assumed control of Station KZPE without seeking Commission authorization.

18. Mr. Zawila did not request Commission authorization to assume control of Station KZPE.

19. Mr. Zawila did not receive Commission authorization to control Station KZPE.

20. Mr. Zawila did not file an FCC Form 854 with WTB on behalf of FCB certifying the completion of construction of or otherwise concerning the tower (antenna structure) in connection with the permit for Station KZPE.

21. Station KZPE was built without a main studio.

22. Station KZPE does not have a main studio.

23. Station KZPE has never had a main studio.

24. Station KZPE does not have a staffed main studio.

25. Station KZPE has never had a staffed main studio.

26. Station KZPE is not currently operating.

27. Station KZPE has not been on the air since November 2000.

28. Station KZPE has only been on the air five separate occasions each of which predate November 2000.

29. Station KZPE has never been in full-time operation.

30. The antenna for Station KZPE was erected on a tower other than that which is authorized under the construction permit.

31. The antenna for Station KZPE was moved to a different tower than is identified in FCB's construction permit for Station KZPE.

32. Station KZPE does not have a local telephone number.

33. Station KZPE has never had a local telephone number.

34. Station KZPE does not have a toll-free telephone number.

35. Station KZPE has never had a toll-free telephone number.
36. Station KZPE never maintained Public Inspection Files.
37. Station KZPE does not have Public Inspection Files.
38. Mr. Zawila did not maintain Public Inspection Files for Station KZPE.
39. Mr. Zawila does not have Public Inspection Files for Station KZPE.
40. FCB did not maintain Public Inspection Files for Station KZPE.
41. FCB does not p have Public Inspection Files for Station KZPE.
42. H.L. Charles did not maintain Public Inspection Files for Station KZPE.
43. The Estate of H.L. Charles did not maintain Public Inspection Files for Station
KZPE.
44. The Estate of H.L. Charles does not have Public Inspection Files for Station
KZPE.

CERTIFICATE OF SERVICE

I, William Zawila, hereby certify that a copy of the foregoing Response to Enforcement Bureau's Requests for Admission to the Estate of H.L. Charles was served on the following by U.S. First Class Mail, postage prepaid, on 3-26-16:

Chief Administrative Law Judge
Richard L. Sippel
FCC

445 12th Street, S.W. - Room 1-C768
Washington, D.C. 20554

Pamela S. Kane, Esquire
Investigations and Hearings Division
Enforcement Bureau
FCC

445 12th Street, S.W. - Room 4-C366
Washington, D.C. 20554

Michael Couzens
6536 Telegraph Avenue -Suite B201
Oakland, CA 94609



William Zawila

Before the
Federal Communications Commission
Washington, DC 20554

Received & Inspected

SEP 08 2017

FCC Mailroom

In the Matter of)

EB Docket No. 03-152

WILLIAM L. ZAWILA)

Facility ID No. 72672

Permittee of FM Station KNGS
Coalinga, California)

AVENAL EDUCATIONAL SERVICES, INC.)

Facility ID No. 3365

Permittee of FM Station KAAX,
Avenal, California)

CENTRAL VALLEY EDUCATIONAL
SERVICES, INC.)

Facility ID No. 9993

Permittee of FM Station KYAF,
Firebaugh, California)

H. L. CHARLES d/b/a FORD CITY
BROADCASTING)

Facility ID No. 22030

Permittee of FM Station KZPE,
Ford City, California)

LINDA WARE d/b/a LINDSAY
BROADCASTING)

Facility ID No. 37725

Licensee of FM Station KZPO,
Lindsay, California)

To: Chief Administrative Law Judge
Richard L. Sippel
To: Enforcement Bureau

RESPONSE TO ENFORCEMENT BUREAU'S REQUESTS FOR
ADMISSION TO WILLIAM L. ZAWILA

William L. Zawila hereby submits the following response to
the Enforcement Bureau's Requests for Admission pursuant to the

EXHIBIT 3

recent discovery orders issued by the presiding officer.

Attached hereto is a copy of the said Requests for Admission.

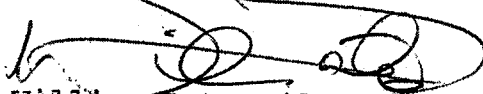
1. The following Requests are admitted: 37,51,52,63..

2. The following Requests are denied: 6,7,8,9,11,13,14,15, 16,17,18,19,22,23,24,25,26,31,32,33,35,38,39,40,41,43,44,45,46, 47,48,49,50,53,54,55,56,57,61,62,64,65,66,67,71,72.

3. The following Requests are denied based on lack of information or belief: 1,2,3,4,5,12.

4. The following Requests are objected to on the following grounds: 58,59,60,68,69, and 70 mis-state facts in that they assume that Mr. Zawila controlled Station KZPE and Station KZPO when in fact this never occurred. Mr. Zawila did not request FCC authorization or receive FCC authorization to control Station KZPE and Station KZPO because he has never controlled Station KZPE and Station KZPO.

10,20,21,27,28,29,30,34, and 36 seek information for irrelevant time periods after the Hearing Designation Order was issued in this matter on 7-16-03. The said HDO upon which this proceeding is based covers matters prior to 7-16-03, not matters after 7-16-03. These Requests numbered above seek information about the current day status of KNGS as well as the current day status and activities of the parties which are all completely irrelevant to the said HDO and matters which occurred prior to 7-16-03.



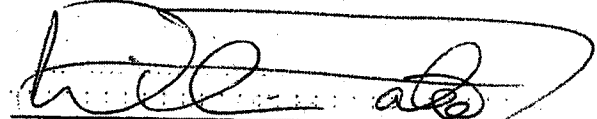
William L. Zawila
Attorney for William L. Zawila
12600 Brookhurst Street - #105
Garden Grove, CA 92840
(714) 636-5040-Telephone
(714) 636-5042-FAX

3-28-16

DECLARATION

I, William L. Zawila, declare under penalty of perjury that the statements contained in the foregoing Response to the Enforcement Bureau's Requests for Admission to William L. Zawila are true and correct to the best of my knowledge and belief.

Executed on March 28, 2016.


William L. Zawila

ff. "Employee" means any director, trustee, officer, employee, partner, corporate parent, subsidiary, affiliate or servant of the designated entity, whether active or retired, full-time or part-time, current or former, and compensated or not.

gg. "Representative" means any consultant, expert, attorney, contractor or other individual or entity engaged by the designated entity to perform some task or assignment for the entity.

hh. "Entity" means any corporation, company, partnership, proprietorship, joint venture, or business, as well as any governmental unit.

ii. "Person" means any natural person or legal entity, including but not limited to any corporation, partnership, proprietorship, firm, trust, association, government entity, organization, or group of persons.

Instructions

a. The singular of a term includes the plural number and vice versa, any use of gender includes both genders, and a verb tense includes all other verb tenses where the clear meaning is not distorted by addition of another tense or tenses.

b. Unless otherwise specified, supply all information requested for the period January 1, 1987 through the present.

REQUESTS FOR ADMISSION

1. You did not file an FCC Form 854 with the Commission certifying the completion of construction of or otherwise concerning the tower (antenna structure) in connection with the permit for Station KNKS.

2. You did not file an FCC Form 854 with WTB on behalf of Avenal certifying the completion of construction of or otherwise concerning the tower (antenna structure) in connection with the permit for Station KAAX.

3. You did not file an FCC Form 854 with WTB on behalf of Central Valley certifying the completion of construction of or otherwise concerning the tower (antenna structure) in connection with the permit for Station KYAF.
4. You did not file an FCC Form 854 with WTB on behalf of FCB certifying the completion of construction of or otherwise concerning the tower (antenna structure) in connection with the permit for Station KZPE.
5. The construction permit for Station KNGS requires that the antenna be mounted at the 88-meter level of a 91-meter pole located at North Dome Ridge in Kettleman Hills, 6 kilometers east-northeast of Avenal, California.
6. As of November 2000, a single 91-meter tower (antenna structure) was not constructed for Station KNGS at North Dome Ridge in Kettleman Hills, 6 kilometers east-northeast of Avenal, California.
7. As of November 2000, a single 91-meter tower (antenna structure) was not constructed for Station KNGS at any location.
8. A single 91-meter tower (antenna structure) was never constructed for Station KNGS at North Dome Ridge in Kettleman Hills, 6 kilometers east-northeast of Avenal, California.
9. A single 91-meter tower (antenna structure) was never constructed for Station KNGS at any location.
10. There is no single 91-meter tower (antenna structure) constructed for Station KNGS.
11. The only poles ever erected at North Dome Ridge in Kettleman Hills, 6 kilometers east-northeast of Avenal, California were two utility poles approximately 50 feet in

height.

12. The KNKS site is located on land owned by the Bureau of Land Management of the U.S. Department of the Interior.

13. You do not have permission from the Bureau of Land Management of the U.S. Department of Interior to operate permanent equipment at the KNKS site.

14. KNKS does not have permission from the Bureau of Land Management of the U.S. Department of Interior to operate permanent equipment at the KNKS site.

15. KNKS never requested permission from the Bureau of Land Management of the U.S. Department of Interior to operate permanent equipment at the KNKS site.

16. You never requested permission from the Bureau of Land Management of the U.S. Department of Interior to operate permanent equipment at the KNKS site.

17. Station KNKS was built without a main studio.

18. As of November 2000, Station KNKS did not have a main studio.

19. As of November 2000, Station KNKS did not have a staffed main studio.

20. Station KNKS does not have a staffed main studio.

21. Station KNKS does not have a main studio.

22. Station KNKS has never had a main studio.

23. Station KNKS has never had a staffed main studio.

24. Station KNKS did not maintain a local telephone number in Coalinga, California.

25. Station KNKS did not maintain a toll-free telephone number.

26. Station KNKS has never maintained a toll-free telephone number.

27. Station KNKS does not maintain a local telephone number in Coalinga, California.

28. Station KNGS does not maintain a toll-free telephone number.
29. You do not maintain a local telephone number for Station KNGS in Coalinga, California.
30. You do not maintain a toll-free telephone number for Station KNGS.
31. You never maintained a local telephone number for Station KNGS in Coalinga, California.
32. You never maintained a toll-free number for Station KNGS.
33. Since obtaining its construction permit, Station KNGS has not maintained Public Inspection Files.
34. Station KNGS does not have Public Inspection Files.
35. Since obtaining the construction permit for Station KAAX, you have not maintained Public Inspection Files for KNGS.
36. You do not have Public Inspection Files for Station KNGS.
37. KNGS is not currently operating.
38. KNGS has never been in operation.
39. KNGS has not been in operation full-time since obtaining its construction permit.
40. You prepared the statement of Ray Knight dated April 8, 2002, attached to your December 31, 2002 letter to the Audio Division.
41. You prepared the statement of Ray Knight dated April 24, 2002, attached to your December 31, 2002 letter to the Audio Division.
42. You prepared Linda Ware's December 18, 1998 declaration attached to your December 31, 2002 letter to the Audio Division.
43. Kunec Engineering did not erect a tower at the KNGS site.

44. Michael G. Kunec did not erect any tower at the KNGS site.
45. You have not received any form of compensation for legal services from Central Valley since 2005.
46. You have not received any form of compensation for legal services from Avenal since 2005.
47. You do not have a written agreement to act as legal representative for Central Valley.
48. You do not have a written agreement to act as legal representative for Avenal.
49. You control Station KZPE.
50. Since the Commission granted FCB a construction permit for Station KZPE, you have controlled Station KZPE.
51. You are not the executor of The Estate of H.L. Charles.
52. You do not have a Commission license for Station KZPE.
53. You assumed control of Station KZPE from H.L. Charles.
54. You assumed control of Station KZPE from Ford City Broadcasting.
55. You assumed control of Station KZPE from The Estate of H.L. Charles.
56. You assumed control of Station KZPE from Robert Willing.
57. You are not authorized by The Estate of H.L. Charles to act on behalf on The Estate of H.L. Charles in connection by Station KZPE.
58. You assumed control of Station KZPE without seeking Commission authorization.
59. You did not request Commission authorization to assume control of Station KZPE.

60. You have not received Commission authorization to control Station KZPE.
61. You control Station KZPO.
62. Since the Commission granted Lindsay Broadcasting a license for Station KZPO,
you have controlled the operations of Station KZPO.
63. You are not the executor of The Estate of Linda Ware.
64. You assumed control of Station KZPO from Linda Ware.
65. You assumed control of Station KZPO from Lindsay Broadcasting.
66. You assumed control of Station KZPO from The Estate of Linda Ware.
67. You assumed control of Station KZPO from Cynthia Rampage.
68. You assumed control of Station KZPO without seeking Commission authorization
69. You did not request Commission authorization to assume control of Station
KZPO.
70. You did not receive Commission authorization to control Station KZPO.
71. You did not file for incorporation of an entity entitled Avenal Educational
Services, Inc. in California on March 5, 1999.
72. You did not file for incorporation of an entity entitled Central Valley Educational
Services, Inc. in California on January 29, 2001.

CERTIFICATE OF SERVICE

I, William Zawila, hereby certify that a copy of the foregoing Response to Enforcement Bureau's Requests for Admission to William L. Zawila was served on the following by U.S. First Class Mail, postage prepaid, on 3-28-16:

Chief Administrative Law Judge
Richard L. Sippel
FCC

445 12th Street, S.W. - Room 1-C768
Washington, D.C. 20554

Pamela S. Kane, Esquire
Investigations and Hearings Division
Enforcement Bureau
FCC

445 12th Street, S.W. - Room 4-C366
Washington, D.C. 20554

Michael Couzens
6536 Telegraph Avenue - Suite B201
Oakland, CA 94609

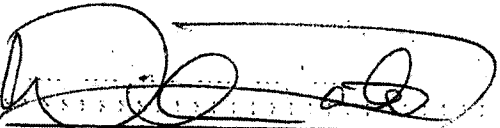

William Zawila

EXHIBIT 2

Pamela Kane

From: Rachel Funk
Sent: Monday, October 30, 2017 3:06 PM
To: Pamela Kane
Cc: Michael Engel
Subject: Zawila exceptions
Attachments: 20171030145743-217.pdf

Hi Pam,

Bob someone from Audio just stopped by, asking about Zawila. It sounded as though EB might not be aware that Zawila filed exceptions, so I'm attaching them here for your perusal.

Rachel B. Funk
Attorney Advisor
Office of the Administrative Law Judges
Federal Communications Commission
(202) 418-2268

CERTIFICATE OF SERVICE

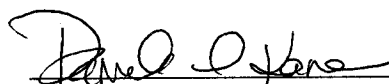
Pamela S. Kane certifies that she has on this 9th day of November, 2017, sent copies of the foregoing "ENFORCEMENT BUREAU'S MOTION FOR LEAVE TO FILE A REPLY TO THE ZAWILA PARTIES' EXCEPTIONS TO SUMMARY DECISION" to:

The Honorable Richard L. Sippel
Chief Administrative Law Judge
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554 (by hand, courtesy copy)

Rachel Funk
Office of the Administrative Law Judge
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554 (by hand, courtesy copy)

William Zawila, Esq.
12600 Brookhurst Street, Suite 105
Garden Grove, CA 92804-4833
(714) 636-5040 (telephone)
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(by first-class mail and e-mail to william.zawila@yahoo.com)

Michael Couzens
Michael Couzens Law Office
6536 Telegraph Avenue
Suite B201
Oakland, CA 94609
(by first-class mail and email to cuz@well.com)


Pamela S. Kane